SAN FRANCISCO ELECTRIC RELIABILITY PROJECT (04-AFC-1)

San Francisco Community Power (SFCP), SET 1B, Further Documents

(Additional Responses to Data Requests: 1 and 3)

Submitted by

CITY AND COUNTY OF SAN FRANCISCO

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SAN FRANCISCO ELECTRIC RELIABILITY PROJECT (04-AFC-1) SFCP, SET 1

Technical Area:

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DATA REQUEST

1. Please provide all analyses and associated workpapers used by the City to support its decision to site three of the combustion turbines at the Potrero Power Plant, as opposed to other locations. In particular, please provide all financial, cost effectiveness, and cost-benefit analyses which examine the implications of different siting locations, as well as the "no project" alternative.

Response: Please refer to the City's objections filed on July 26, 2004 and to the response filed on August 18, 2004. Consistent with those objections and responses, the City is providing a second set of documents that will be sent out to Mr. Moss and the CEC by overnight mail today. The City will provide copies of these documents to other parties upon request. The City requires additional time to continue the identification of responsive documents and will provide further documents and an update no later than September 20.

The documents provided with these responses are in the City's possession and reflect analyses of different siting options. These documents were found in the files of various City staff and are provided for completeness even though most were not presented to or considered by higher level City policy makers in the context of final determinations on the proposed location to be filed with the CEC.

3. Please provide all operational scenarios, analyses and associated workpapers, as well as resulting emissions impacts, related to the number of hours the CTs are expected to run.

Response: Please note that the City's Application for Certification reflects the impacts of running the SFERP for the full number of hours the facility is proposed to be permitted; that is 12,000 hours per year total for the 3 CTs. During the first ten years of operation, the City will not control how many of these hours the CTs will actually run since under the PPA, the Department of Water Resources (DWR) "shall have the discretion to Schedule or Dispatch the Facility and the Seller shall comply with any such direction to Schedule or Dispatch of the Facility, consistent with Facility operating parameters." (PPA section 2.05).

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continue the identification of responsive documents and will provide further documents and an update no later than September 20.

The documents provided with these responses are in the City's possession and reflect operational scenarios, analyses, and associated workpapers, as well as resulting emission impacts. These documents were found in the files of various City staff and are provided for completeness. While the documents may reflect particular scenarios about CT running hours developed by or for City staff at different times, they do not reflect a City position on expected CT running hours, since no such position exists at this time beyond the request for permitting for 12,000 hours per year total for the three CTs.